

Fill in this information to identify the case:

Debtor 1 Abayomi H. Adeyemi

Debtor 2
(Spouse, if filing)United States Bankruptcy Court for the: Middle District of PACase number 18-00595 HWV**Form 4100R****Response to Notice of Final Cure Payment**

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of Creditor: PNC BANK, NATIONAL ASSOCIATION

Court claim no. (if known): 6

Last 4 digits of any number you use to identify the debtor's account: 6393

Property address:

3944 Sheppard Drive
Dover, PA 17315**Part 2: Prepetition Default Payments**

Check one:

☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ _____**Part 3: Postpetition Mortgage Payment**

Check one:

☐ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on:

☒ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

a. Total postpetition ongoing payments due:	(a)	\$ <u>4,908.60</u>
b. Total fees, charges, expenses, escrow, and costs outstanding:	+ (b)	\$ 0.00
c. Total. Add lines a and b.	(c)	\$ <u>4,908.60</u>

Creditor asserts that the debtor(s) are contractually obligated for 02 / 01 / 2023
the postpetition payment(s) that first became due on:

Part 4: Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

Part 5: Sign Here

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box::

- ☐ I am the creditor.
☒ I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

x/s/ Michael Farrington

Date 04/12/2023

Michael Farrington
12 Apr 2023, 11:38:31, EDT

KML Law Group, P.C.
701 Market Street, Suite 5000
Philadelphia, PA 16106
215-627-1322
bkgroup@kmlawgroup.com
Attorney for Creditor

Last Updated by		SZTKW		Post-Petition Payment Suspense Deposit / Disbursements	Post-Petition Payment Suspense Balance	Contractual Date Paid	Post Petition Date Paid	PP Payment Suspense
Date Updated		4/3/2023						
Case Number		18-00595						
Filing Date		2/15/2018						
Chapter Filed		13						
Transaction Date	All Funds Received	Post-Petition Amount Received						
			Beginning Balances					
5/21/2018	\$1,532.82	\$1,532.82		\$0.00		4/1/2012	3/1/2018	\$64.71
7/27/2018	\$1,532.82	\$1,532.82		\$0.00		5/1/2012	4/1/2018	\$64.71
8/2/2018			\$211.86	\$211.86				
8/14/2018	\$1,532.82	\$1,532.82		\$211.86		6/1/2012	5/1/2018	\$64.71
8/17/2018	\$1,149.52	\$1,149.52	\$1,149.52	\$1,361.38				
2/19/2019	\$1,537.96	\$1,537.96	\$5.14	\$1,366.52		7/1/2012	6/1/2018	\$64.71
4/25/2019 MFR Requested				\$1,366.52				
7/19/2019	\$1,537.96	\$1,537.96	\$5.14	\$1,371.66		8/1/2012	7/1/2018	\$64.71
8/14/2019	\$1,537.96	\$1,537.96	\$5.14	\$1,376.80		9/1/2012	8/1/2018	\$64.71
12/18/2019 Agreed Order Filed		(\$1,376.80)	(\$1,376.80)	\$0.00				
12/8/2021	\$1,549.12	\$1,549.12	\$1,549.12	\$1,549.12				
1/18/2022	\$1,549.12	\$1,549.12	\$1,549.12	\$3,098.24				
1/24/2022 Loan Mod Maintenance				\$3,098.24		Loan Modification Effective 11/1/2021 -- New due date 12/1/2021		
				\$3,098.24				
				\$3,098.24				
2/9/2022			(\$3,098.24)	\$0.00		12/1/2021	12/1/2021	
2/9/2022				\$0.00		1/1/2022	1/1/2022	
2/15/2022	\$1,549.12	\$1,549.12		\$0.00		2/1/2022	2/1/2022	
3/10/2022	\$1,495.12	\$1,495.12	\$1,495.12	\$1,495.12				
4/14/2022	\$1,581.37	\$1,581.37		\$1,495.12		3/1/2022	3/1/2022	
5/3/2022	(\$1,462.75)	(\$1,462.75)	(\$1,462.75)	\$32.37				

Post 2 Suspend	\$0.00
----------------	--------

PPFN Balance	\$0.00
--------------	--------

Trustee Suspend	\$0.00
-----------------	--------

Due for	2/1/2023	2/1/2023
Contractual Pmts Due		0
Current Date		4/6/2023
Days Past Due		-64
PCN's		
Filed	Effective	Amount
POC	2/1/2018	\$1,532.82
MSP	3/1/2018	\$1,532.82
12/21/2018	2/1/2019	\$1,537.96
1/7/2020	2/1/2020	\$1,531.36
MSP	9/1/2020	\$1,474.37
MSP	1/1/2021	\$1,479.16
MSP	12/1/2021	\$1,502.33
MSP	2/1/2022	\$1,581.37
MSP	12/1/2022	\$1,636.20

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**IN RE: Abayomi H. Adeyemi dba Hope
for Children**

Debtor(s)

**PNC BANK, NATIONAL
ASSOCIATION**

Movant

vs.

**Abayomi H. Adeyemi dba Hope for
Children**

Debtor(s)

Jack N. Zaharopoulos,

Trustee

BK NO. 18-00595 HWV

Chapter 13

Related to Claim No. 6

**CERTIFICATE OF SERVICE
RESPONSE OF FINAL CURE MORTGAGE PAYMENT**

I, Michael P. Farrington of KML Law Group, P.C., certify that I am, and at all times hereinafter mentioned was, more than 18 years of age and that on April 13, 2023, I served the above captioned pleading, filed in the proceeding on the parties at the addresses shown below:

Debtor(s)

Abayomi H. Adeyemi dba Hope for Children
776 Monet Drive
Hagerstown, MD 21740

Attorney for Debtor(s) – (via ECF)

Nicholas G. Platt
Mooney Law
230 York Street
Hanover, PA 17331

Trustee – (via ECF)

Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036

Method of Service: electronic means or first-class mail

Dated: April 13, 2023

/s/ Michael P. Farrington

Michael P. Farrington Esq.
Attorney I.D. 329636
KML Law Group, P.C.
BNY Mellon Independence Center
701 Market Street, Suite 5000
Philadelphia, PA 19106
(215) 825-6488
mfarrington@kmlawgroup.com